

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	No. 4:19 CR 568 SNLJ (JMB)
)	
v.)	
)	
SHON SANDERS,)	
)	
Defendants.)	

**UNITED STATES OF AMERICA'S
FIRST MOTION FOR ADDITIONAL TIME
IN WHICH TO RESPOND TO SANDERS' PRETRIAL MOTION**

COMES NOW the United States of America and respectfully requests an additional 31 days, up to and including March 27, 2020, in which to respond to defendant Shon Sanders' (Sanders) pretrial motion (Doc. # 29). The United States of America states as follows in support of this motion:

1. Sanders has filed a motion to suppress evidence and statements (Id.). Prior to its filing, Sanders requested and received five extensions of time (Docs. # 27, 25, 23, 21, 18).

2. The United States' response to Sanders' pretrial motion is due February 25, 2020 (see Doc. # 28).

3. Upon receipt of Sanders' motion, the United States promptly notified Sanders' legal counsel of additional uncharged conduct which could be the subject of a superseding indictment, serve as affirmative evidence under Federal Rule of Evidence 404(b), or some combination of both. Discovery related to Sanders' uncharged conduct has also been produced.

4. As a result, and after consultation with Sanders' legal counsel, the United States seeks additional time in which to respond to Sanders' pretrial motion. Among other things, this additional time will allow the United States and Sanders to identify additional evidence that could arguably be the subject of a suppression motion, determine the ultimate scope of the charges

against Sanders, or, potentially, reach a resolution of the matter without the need for further pretrial proceedings.

5. Counsel for Sanders has kindly indicated that she has no objection to this first request for additional time as the additional time will benefit Sanders as well.

WHEREFORE, the United States respectfully requests that this Court grant its motion.

Respectfully submitted,

JEFFREY B. JENSEN
United States Attorney

/s/ Thomas Rea
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on February 25, 2020, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon all parties and counsel of record.

/s/ Thomas Rea
THOMAS REA